

Statement of Basis - Narrative
NSR Permit or NOI

COMPANY: LM Concrete Pumping
FACILITY: LM Concrete Pumping - Santa Fe Location
PERMIT NO.: 3534
IDEA ID No.: 26235 - PRN20070001
PERMIT WRITER: Cember Hardison

Fee Tracking

Track- ing	NSR tracking entries completed: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	NSR tracking page attached to front cover of permit folder: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Paid Invoice Attached: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Balance Due Invoice Attached: <input type="checkbox"/> Yes <input type="checkbox"/> No
	Invoice Comments: \$1,695 small business fee paid in full on 3-27-07

Review	Date to Enforcement: N/A	Inspector Reviewing: N/A
	Date Review Completed: N/A	
	Date Responded to Enforcement Comments: N/A	
	Date to Applicant: N/A	
	Date to HPM: N/A	

- 1.0 **Plant Process Description:** The L.M. Concrete Pumping – Santa Fe Location plant is located in City of Santa Fe, Santa Fe County, New Mexico. The address of the plant is #30 Colony Dr and can be found near the intersection of County Rd 56 and Colony Dr.

The Santa Fe plant is a concrete products facility (sic 3272 Concrete Products, Except Block and Brick) that uses a mobile silo and mobile volumetric truck to manufacture concrete products. At the plant, cement, aggregate, sand, and water are loaded into separate compartments, or feed bins, located in a mobile volumetric mix truck. The truck travels to an off site location and mixes and pours the concrete at the off site location.

Maximum Production Limits for GCP-5 facilities are 2400 YPD, however, the applicant has registered as a “small facility” (Paragraph I.E. of the permit, <= 360 YPD). See Large and Small Facility applicability requirements in Table I.E1 of the GCP-5.

Total Annual Emission Limits for GCP-5 facilities are found in Table III.G.I in the GCP-5 permit and include the following: 95 TPY ea. for NOx, CO, VOCs, TSP; 50 TPY SO2; 8 TPY Single HAP; and 23 TPY Total HAPS.

The Santa Fe location Concrete Production components submitted in the March 22, 2007 registration include a Mobile Tech trailer mounted silo and a Mobile Concrete

Technologies volumetric mix truck. The trailer mounted silo consists of a 200 barrel cement silo and a 150 ft² Belgrade Steel dust collector. The mobile volumetric mix truck consists of aggregate, sand, and cement feed bins, and a concrete mixer (9 yd³).

According to the concrete production components listed in the March 22, 2007 registration, this plant is neither as a Transit Mix (also known as a truck mix) nor a Ready Mix (also known as a central mix) facility. Therefore, the following Emissions Restrictions and Conditions (III.F. of the GCP-5) have been interpreted for this facility as follows:

- III.F.2.c. – This condition is intended to control emissions from truck mix rotary drums, therefore this condition does not apply to this plant operating with the production components listed in the March 22, 2007 registration.
- III.F.2.d – Cementaceous materials need to be injected through a boot, however the use of an aggregate curtain isn't applicable to this facilities' production equipment.
- III.F.2.e. – This requirement is not applicable to small facilities producing <= 360 YPD.
- III.F.12. - This is not a central mix facility.

All other restrictions and conditions of this GCP-5 apply to the Santa Fe location, including but not limited to, Sections III - *Facility Operating Requirements* and IV - *Monitoring, Recordkeeping and Notification Requirements*.

2.0 **Description of this Modification:** Not Applicable

History:

Permit Number	Issue Date	Action Type	Description of Action (Changes)
3534	4-24-07	GCP-5	Registered under a GCP-5 Permit

Public Response/Concerns: As of April 23, 2007, no public response has been received.

3.0 **Compliance Testing:** To be conducted per the terms and conditions of the GCP-5.

4.0 **Modeling:** Per Subsection II.E.1 of the GCP-5, air dispersion modeling is not required by the Applicant. The Department completed a general air dispersion modeling to develop the requirements of the GCP-5.

5.0 **New/Modified/Unique Conditions:** None

6.0 **State Regulatory Analysis(NMAC/AOCR):**

20 NMAC	Title	Applies (Y/N)	Comments
2.3	Ambient Air Quality Standards	Y	Applies to all facilities' sources
2.61	Smoke and Visible Emissions	Y	The main emission sources will be dust from haul roads, aggregate stockpiles, and concrete loading and mixing operations.
2.70	Operating Permits	N	PTE is not > 100 TPY
2.71	Operating Permit Fees	N	PTE is not > 100 TPY
2.72	Construction Permits	Y	Section 220 – General Permit
2.73	NOI & Emissions Inventory Requirements	Y	Applicable to all facilities that require a permit. PER > 10 TPY for criteria pollutants
2.74	Permits-Prevention of Significant Deterioration	N	Source is not one of the 28 listed, so is not a PSD major source.
2.75	Construction Permit Fees	Y	This facility is subject to 20 NMAC 2.72
2.77	New Source Performance	N	40 CFR Part 60 does not apply to the facility.
2.78	Emissions Standards for HAPs,	N	This facility is not subject to 40 CFR Part 61 NESHAPs.
2.79	Permits B Nonattainment Areas	N	This facility is not located in a non-attainment area.
2.82	MACT Standards for Source Categories of HAPs.	N	This facility is not a major source of HAPs so is not subject to the requirements of 40 CFR Part 63.

7.0 Federal Regulatory Analysis:

Air Programs Subchapter C (40 CFR 50)	Title National Primary and Secondary Ambient Air Quality Standards	Applies (Y/N)	Comments
C	Federal Ambient Air Quality Standards	Y	Applies to all facilities

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart applies.

NESHAP Subpart (40 CFR 61)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart applies.

NESHAP Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
A	General Provisions	N	This applies only if any other subpart applies.

Note: